

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

Layla Fakhr El-Din El-Sawy and
Egyptian European Pharmaceutical
Industry, an Egyptian corporation,

Plaintiff,

Case No.2:20-cv-13409-LJM-KGA
District Court Judge Laurie J. Michelson
Magistrate Judge Kimberly G. Altman

vs.

Regents of the University of Michigan,
a non-profit educational institution of the
State of Michigan, and Mark L. Day,

Defendants.

E. Powell Miller (P39487)
Kevin F. O'Shea (P40586)
Daniel L. Ravitz (P83031)
Attorneys for Plaintiffs
950 W. University Drive, Suite 300
Rochester, MI 48307
(248) 841-2200
kfo@millerlawpc.com
dlr@millerlawpc.com

Thomas B. Bourque (P46595)
Deloof Dever Eby Wright Milliman
Bourque & Issa, PLLC
Attorneys for Defendant Day
301 N. Main Street, 2nd Floor
Ann Arbor, MI 48104
(734) 769-2691
(734) 994-0206 fax
tbourque56@gmail.com

RENEWED JOINT MOTION TO EXTEND SCHEDULING ORDER

Plaintiffs Layla Fakhr El-Din El-Sawy ("El-Sawy") and Egyptian European
Pharmaceutical Industry ("EEPI") and Defendant Mark Day ("Day") file their
Renewed Joint Motion to Extend Scheduling Order and state in support:

1. The most recent Order of the Court on July 7, 2023, extended the due date for filing Motions for Summary Judgment to August 25, 2023. The parties have completed discovery and have been conducting serious settlement negotiations for all claims of all parties.

2. The parties have exchanged multiple proposals, but due to the international aspect of the case, the fact that all of the plaintiff representatives are overseas, and that the University of Michigan has been asked to consent, it has taken significantly longer to respond to the exchanged proposals than the parties originally anticipated. The negotiations appear to be within days of completion at this point.

3. The settlement negotiations involve proposals for continuing work by the parties after an agreement is reached, and the details of any such work are reasonably complex and will require some time to work through.

4. The parties prefer to expend the time and effort into settlement negotiations instead of filing and responding to lengthy summary judgment motions as to the claims of both plaintiffs.

5. The parties believe that an extension of the date for filing dispositive motions would need to be extended to **September 15, 2023**.

6. There are no dates presently set for any pretrial orders, pretrial conferences, Motions in Limine, or for the jury trial.

7. The extension sought does not prejudice any party.

Wherefore, the parties jointly request that the Court extend the date for filing
dispositive motion to **September 15, 2023**.

Dated: August 24, 2023

Respectfully submitted,

/s/ Kevin F. O'Shea

E. Powell Miller (P39487)
Kevin F. O'Shea (P40586)
Daniel L. Ravitz (P83031)
Attorneys for Plaintiffs
950 W. University Drive, Suite 300
Rochester, MI 48307
(248) 841-2200
kfo@millerlawpc.com
dlr@millerlawpc.com

/s/ Thomas B. Bourque

Thomas B. Bourque (P46595)
Deloof Dever Eby Milliman
& Issa, PLLC
Attorneys for Defendant Day
301 N. Main Street, 2nd Floor
Ann Arbor, MI 48104
(734) 769-2691
(734) 994-0206 fax
tbourque56@gmail.com

PROOF OF SERVICE

The undersigned certifies that a copy of the above document was served upon the attorney(s) of record of all the party(ies) in this action by serving same at the business address(es) as disclosed by the pleading of record herein on August 24, 2023, by

____ U.S. Mail
____ Hand Delivery
____ Electronic Mail

____ Facsimile
____ Overnight Mail
____X____ Electronic Filing

/s/ Thomas Bourque
Thomas Bourque